

1 David G. Bayles (SBN 208112)
2 ARENT FOX LLP
3 555 West Fifth Street, 48th Floor
4 Los Angeles, CA 90013-1065
5 Telephone: (213) 629-7400
6 Facsimile: (213) 629-7401

7 Attorney for Plaintiff
8 ALL POINTS CAPITAL CORP., a New York
9 corporation
10

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 ALL POINTS CAPITAL CORP., a New
17 York Corporation,,
18

19 Plaintiff,
20

21 v.
22

23 ARCHITECTURAL METAL
24 PRODUCTS, INC., an Alaska corporation;
25 PACIFIC ROLLFORMING, LLC, an
26 Alaska limited liability company;
27 RIDGETOP HAWAII, INC., an Hawaiian
28 corporation; RIDGETOP ROOFING AND
GUTTER, INC., an Alaska corporation;
ROBERT OLLMAN, a citizen of the State
of Wisconsin; BORIS GOKHMAN, a
citizen of the State of Wisconsin; and
TODD BEASLEY, a citizen of the State of
Alaska.,

Defendants.
NEW YORK/#210006.1

Case No.: C 08-04394 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

CURRENT Case Management Conference:

Date: March 19, 2009
Time: 3:30 P.M.
Judge: Courtroom 6
17th Floor
United States District Courthouse
450 Golden Gate Avenue
San Francisco, California

PROPOSED Case Management Conference:

Date: May 21, 2009

1 WHEREAS Plaintiff All Points Capital Corp., a New York corporation ("Plaintiff"), is
2 represented by Arent Fox LLP, by attorneys in the New York and Los Angeles offices of the
3 firm;

4 WHEREAS Defendants Architectural Metal Products, Inc., an Alaska corporation, Pacific
5 Rollforming, LLC, an Alaska limited liability company, Ridgetop Hawaii, Inc., an Hawaiian
6 corporation, Ridgetop Roofing and Gutter, Inc., an Alaska corporation, and Todd Beasley, a
7 citizen of the State of Alaska (sometimes collectively referred to herein as the "Beasley
8 Defendants") are represented by Frederick Phillips, an attorney whose office is in San Diego,
9 California,

10 WHEREAS Defendant Boris Gokhman, a citizen of the State of Wisconsin is appearing
11 Pro Se in this action ("Defendant Gokhman"),

12 WHEREAS Defendant Vladimir Shuk, a citizen of the State of Wisconsin is also
13 appearing Pro Se. in this action ("Defendant Shuk"); and

14 WHEREAS the parties are continuing to negotiate a stipulated judgment, all of the parties
15 have expressed a willingness to resolve this dispute by a stipulated judgment, and the parties
16 desire additional time for their negotiations to proceed without the added expense of traveling to
17 San Francisco for the joint case management conference currently set for March 19, 2009;

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the
2 Court, the case management conference shall be continued for approximately sixty days until
3 May __, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date
4 and time as may be convenient for the Court.

5 Dated: Arent Fox LLP

6
7 By: DAVID G. BAYLES
8 Attorneys for Plaintiff
9 ALL POINTS CAPITAL CORP.

10 Dated: By: FREDERICK PHILLIPS, on behalf of
11 Architectural Metal Products,
12 Rollforming, LLC, Ridgetop Hawaii,
13 Inc., Ridgetop Roofing and Gutter, Inc.,
14 and Todd Beasley

15 Dated: 03/08/09 By: BORIS GOKHMAN, Pro Se

16 Dated: 3/8/09 By: VLADIMIR SHUK, Pro Se

17 **[PROPOSED] ORDER**

18 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing
19 therefore, the case management conference in the above-referenced action currently set for
20 March __, 2009, is hereby continued until May __, 2009, at 3:30 p.m. or _____ in
21 Courtroom 6 of the above-entitled Court.

22 IT IS SO ORDERED.

23 Dated: _____

24 The Hon. Vaughn R. Walker
25 United States District Judge
26
27
28

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the
2 Court, the case management conference shall be continued for approximately sixty days until
3 May __, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date
4 and time as may be convenient for the Court.

5 Dated:

Arent Fox LLP

6
7 By:

DAVID G. BAYLES
Attorneys for Plaintiff
ALL POINTS CAPITAL CORP.

8
9 Dated: 3-6-09

10 By:

FREDERICK PHILLIPS, on behalf of
Architectural Metal Products,
Rollforming, LLC, Ridgetop Hawaii,
Inc., Ridgetop Roofing and Gutter, Inc.,
and Todd Beasley

11
12
13 Dated:

14 By:

BORIS GOKHMAN, *Pro Se*

15 Dated:

16 By:

VLADIMIR SHUK, *Pro Se*

17 **PROPOSED ORDER**

18 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing
19 therefore, the case management conference in the above-referenced action currently set for
20 March __, 2009, is hereby continued until May __, 2009, at 3:30 p.m. or _____ in
21 Courtroom 6 of the above-entitled Court.

22 IT IS SO ORDERED.


23
24 Dated: _____

The Hon. Vaughn R. Walker
United States District Judge

NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the Court, the case management conference shall be continued for approximately sixty days until May 21, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date and time as may be convenient for the Court.

Dated: 3/9/09

Arent Fox LLP

By: 
DAVID G. BAYLES
Attorneys for Plaintiff
ALL POINTS CAPITAL CORP.

Dated:

By:
FREDERICK PHILLIPS, on behalf of
Architectural Metal Products,
Rollforming, LLC, Ridgetop Hawaii,
Inc., Ridgetop Roofing and Gutter, Inc.,
and Todd Beasley

Dated:

By:
BORIS GOKHMAN, *Pro Se*

Dated:

By:
VLADIMIR SHUK, *Pro Se*

PROPOSED ORDER

Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing therefore, the case management conference in the above-referenced action currently set for March 19, 2009, is hereby continued until May 21, 2009, at 3:30 p.m. or _____ in Courtroom 6 of the above-entitled Court.

IT IS SO ORDERED.

Dated: 3/10/2009



ALL POINTS CAPITAL V. ARCHITECTURAL METAL PRODUCTS
CASE NO.: C 08-04394 VRW
USDC, NORTHERN DISTRICT, SAN FRANCISCO
PROOF OF SERVICE

I am a citizen of the United States. My business address is ARENT FOX LLP, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013. I am employed in the county of Los Angeles where this service occurs. I am over the age of 18 years, and not a party to the within cause.

On March 9, 2009, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all parties appearing on the docket sheet:

Stipulation and [Proposed] Order to Continue The Case Management Conference

(BY FAX) by transmitting via facsimile from facsimile number (213) 629-7401 the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m. A statement that this document was successfully transmitted without error is hereby attached to this Proof of Service.

☒ (BY MAIL) I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed to the person(s) listed below, or as stated on the attached service list and sealed and placed the envelopes for collection and mailing following ordinary business practices.

(BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s) containing the document(s) to the persons(s) listed below or as stated in the attached service list.

(BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s) addressed to the person(s) listed below or as stated on the attached service list, and caused those envelopes to be delivered to an overnight delivery carrier, with delivery fees provided for, for next-business-day delivery to whom it is to be served.

☒ (BY ECF) I caused said documents to be transmitted using the Court's ECF system.

SEE ATTACHED SERVICE LIST

☒ **(Federal)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under the penalty of perjury under the laws of the United States of America that the above is true and correct.
Executed on March 9, 2009, at Los Angeles, California.


Gladys Madrid

Frederick C. Phillips, Esq.
Phillips, Haskett & Ingwalson
701 "B" Street, Suite 1190
San Diego, CA 92101
Tel.: (619) 231-3737
Fax: (619) 233-1223

Vladimir Shuk in Pro Per
New Land
1840 North Farwell Avenue, #203
Milwaukee, WI 53202

Via U. S. Mail

Via ECF

Boris Gokhman in Pro Per
New Land
1840 North Farwell Avenue, #203
Milwaukee, WI 53202

Via U.S. Mail